

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

TALEN ENERGY SUPPLY, LLC, et al.

Debtors.¹

CHAPTER 11

CASE NO. 22-90054 (MI)

**DECLARATION OF JOHN S. KAPLAN IN SUPPORT OF PUGET SOUND ENERGY,
AVISTA CORPORATION, PACIFICORP, AND PORTLAND GENERAL ELECTRIC
COMPANY'S SUPPLEMENTAL BRIEF IN SUPPORT OF
MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

I, John S. Kaplan, declare as follows:

1. I am an attorney at Perkins Coie LLP and one of the attorneys representing Puget Sound Energy, Inc., Avista Corporation, PacifiCorp, and Portland General Electric Company in this matter.

2. I have personal knowledge of, and am competent to testify to, the matters set forth in this Declaration.

3. Attached as **Exhibit A** is a true and correct copy of excerpts of the transcript of the hearing in this matter on June 10, 2022.

I certify and attest that the foregoing statements made by me
are true under penalty of perjury.

Dated this 20th day of June, 2022.

/s/ John S. Kaplan
John S. Kaplan

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://cases.ra.kroll.com/talenenergy>. The Debtors' primary mailing address is 1780 Hughes Landing Boulevard, Suite 800, The Woodlands, Texas 77380.

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2022, a true and correct copy of the foregoing document was electronically filed in the case with the Clerk of the United States Bankruptcy Court by using the CM/ECF system, and a copy was served on the parties who are entitled to receive notice via the Court's ECF notification system.

/s/John S. Kaplan

John S. Kaplan